

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Mail Processing Network
Rationalization Service Changes, 2012

Docket No. N2012-1

PUBLIC REPRESENTATIVE'S FIRST SET
OF INTERROGATORIES AND REQUESTS FOR PRODUCTION TO
UNITED STATES POSTAL SERVICE WITNESS WILLIAMS (PR/USPS-T-1: 1-4)

(January 31, 2012)

Pursuant to 39 CFR 3001.25 through 3001.28, the Public Representative hereby submits the following interrogatories and requests for production of documents. Definitions and instructions included with the Public Representative's First Set of Interrogatories and Requests for Production to United States Postal Service, PR/USPS-1-3 dated December 21, 2011, are hereby incorporated by reference.

The Public Representative encourages the Postal Service to discuss issues of burden, privilege, relevance, or question clarity informally to obviate the need for objections or motions practice.

Respectfully Submitted,

/s/ Christopher J. Laver

Public Representative for
Docket No. N2012-1

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PR/USPS-T-1-1

On page 9 of your testimony you state, "The Postal Service is planning to implement a fundamental realignment of the mail processing network to utilize capital assets and personnel more efficiently over the long-run, while also meeting its obligation to provide regular and effective levels of mail service."

- a. Do service performance results measure the attainment of effective mail service? If so, how?
- b. How will service performance results be used to gauge the level of effective mail service after the proposed changes are implemented?
- c. Will service performance targets be amended to reflect the proposed changes? If so, how?

PR/USPS-T-1-2

On page 9 of your testimony you state, "...the most significant service changes are in the narrowing of the scope of the overnight and two-day First-Class Mail service standards." The recent service performance results show that the Postal Service exceeded service performance targets only for First-Class overnight and two-day.

- a.) Will the proposed changes impact First-Class Mail overnight and two-day annual service performance results? If so, how?
- b.) Will the proposed changes impact Periodicals overnight and two-day annual performance results? If so, how?

PR/USPS-T-1-3

On page 21 of your testimony you explain that "the modifications to the 2-day service standard business rules will have the effect of expanding the number of 3-digit origin-destination ZIP Code pairs with a 3-day service standard." How will this expansion affect service performance results for First-Class Mail and Periodical three-to-five day?

PR/USPS-T-1-4

Please explain how the proposed changes will affect scanning procedures for First-Class Mail using IMb.